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March 29, 2021

BY ECF

Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street
New York, New York 10007

Re: Carlynn Alexander v. New York Police Department, et al.
Civil Action No.: 21-cv-2543 (JMF)

Dear Judge Furman:

I am the Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, assigned to represent defendant New York City Police Department s/h/a New York Police Department (“NYPD” or “Defendant”)¹ in the above-referenced action. I write to respectfully request a 45-day extension of time, from March 31, 2021 to May 14, 2021, for Defendant to respond to the complaint. This is Defendant’s first request for an extension of time. In addition, and with such an extension, Defendant respectfully requests that the initial pretrial conference, scheduled for May 4, 2021, at 4:00 p.m., be adjourned to a date and time following Defendant’s response to the complaint, and otherwise convenient to the Court. Lastly, I respectfully request that the initial pretrial conference be converted from an in-person conference to a teleconference in light of personal circumstances during the ongoing COVID-19 pandemic, which I can discuss further in camera and ex parte at the Court’s request.

The undersigned attempted to reach Plaintiff’s counsel via email and telephone on March 29, 2021, but did not receive a response to whether he would consent to this application. This extension is requested to provide this Office with sufficient time to thoroughly investigate the allegations contained in the complaint and to formulate an appropriate response. In addition, this Office must identify, locate, and review any documents relevant to Plaintiff’s claims.

¹ Upon information and belief, the individually named defendant, Marisa Caggiano, has not been served with a summons and complaint.

Thank you for your consideration of this matter.

Respectfully Submitted,

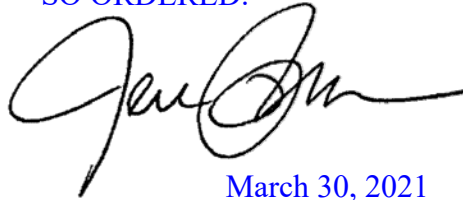
/s/

Laura C. Williams
Assistant Corporation Counsel

cc: Randy E. Kleinman, Esq. (by Email and First-Class Mail)
Gerstman Schwartz, LLP
Attorneys for Plaintiff

Application GRANTED. In light of the extension, the initial pretrial conference previously scheduled for May 4, 2021, *see* ECF No. 3, is adjourned to **May 24, 2021, at 3:30 p.m.** The conference will be conducted by telephone, in accordance with procedures that will be set forth in a future order. In advance of the conference, counsel should discuss whether the City should be substituted for the New York Police Department and, if appropriate, submit a proposed stipulation and order to that effect. The Clerk of Court is directed to terminate ECF No. 5.

SO ORDERED.

A handwritten signature in black ink, appearing to be "J. J. [unclear]", is written over the text "SO ORDERED." and the date.

March 30, 2021